

**REMARKS**

Claims 1 and 3, 4, 7 and 54 are all the claims pending in the application.

Claims 1 and 7 have been objected to because of certain minor informalities.

Claim 1 has been rejected under 35 U.S.C. § 102(b) as being anticipated by Nakamura et al (JP 08-187868)

Claims 3, 4 and 54 have been rejected based under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of Usui (6,158,847).

Claim 7 has been rejected based under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of Okazawa (JP 06-023982)

The Applicants traverse the rejections and request reconsideration.

In rejecting the claims over Nakamura, standing alone or in combination with other references the Examiner contends that some of the limitations in the base claims are process limitations and not structural limitations. The Applicants have amended the claims to more clearly define these limitations as structural limitations. Novel features of the present invention, as recited in claim 1, include the fact that several structures are formed by etching. These structures have been recited as “etched partition wall,” “etched land,” etc.

It should be noted that the high level of structural accuracy and positioning can be achieved only if these structures are formed by etching. The Applicants respectfully submit that, a recitation akin to “etched partition wall” is a structural limitation. A simple analogy will clarify the Applicant’s contention. A blunt knife is structurally different from a “sharpened knife.” Similarly a “painted wall” is structurally different from a “wall-papered wall.” Likewise an etched structure in a semiconductor is structurally different from the same structure that is

formed by some other process. Therefore, the Applicants respectfully request the Examiner to give patentable weight to the “etched” structures recited in the claims.

With the above noted clarification, the Applicants incorporate all the arguments made in the previous response, by reference. Notable, the Applicants respectfully submit that Nakamura does not disclose, or remotely suggest, an etched partition wall and an etched land.

In the ink jet recording head disclosed by Nakamura, only the island part 9, that is disposed on one side of the polymer film is an etched structure. On the other hand, the spacer 3, which is disposed on the other side of the polymer film 8 so as to form the pressure chamber 4, the ink inlet ports 5 and the reservoirs 6 are all not etched structures.

Likewise, the spacer 3 can not be an etched structure because the pressure chamber 4 is tapered although the vertical line of the section of the reservoir 6 is not tapered as shown in Fig.2 of Nakamura. It is believed to be technically impossible to form both a tapered vertical line and a non-tapered vertical line using a same etching process.

Claim 1 should be allowed at least because Nakamura does not disclose, or remotely suggest, the claimed etched features.

The cited secondary references Usui and Okazawa are both silent about the above mentioned etched structures.

Claims 13, 4, 7 and 54 are allowable at least because they do not overcome the deficiency noted above in relation to Nakamura.

**CONCLUSION**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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